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16 CADENCE DESIGN SYSTEMS, INC.

17 IN THE UNITED STATES DISTRICT COURT

18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

19 SAN JOSE DIVISION

20 CADENCE DESIGN SYSTEMS, INC., a
21 Delaware corporation,

22 Plaintiff,

23 v.

24 JEFFREY APPLEBAUM,

25 Defendant.

Case No. 5:24-cv-00290-PCP

Judge: Honorable P. Casey Pitts

JOINT STIPULATION TO EXTEND
DEADLINE TO FILE CASE
MANAGEMENT STATEMENT AND
RESCHEDULE CASE MANAGEMENT
CONFERENCE

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Defendant (collectively the “Parties”)
2 hereby jointly stipulate and agree as follows, subject to the approval of the Court, to continue the dates
3 for the parties to file a Rule 26(f) Report and Case Management Statement, and the Initial Case
4 Management Conference (“CMC”):

5 WHEREAS, on January 17, 2024, Plaintiff Cadence Design Systems, Inc. (“Cadence”) filed
6 this case and alleging that Defendant Mr. Applebaum, *inter alia*, misappropriated its trade secrets and
7 breached his agreement with Cadence by transferring large volumes of Cadence proprietary files to his
8 personal computer devices (Dkt. No. 1.);

9 WHEREAS, on January 17, 2024, this Court entered a scheduling order (Dkt. No. 4) setting
10 April 11, 2024 as the last day for the parties to file a Rule 26(f) Report and file a Case Management
11 Statement, and setting an Initial Case Management Conference (“CMC”) hearing for April 18, 2024 at
12 1:00 PM;

13 WHEREAS, since bringing this action, Mr. Applebaum has tendered his electronic devices to
14 a forensic analysis firm and agreed to work with Cadence and the forensic analysis firm to identify and
15 delete all Cadence proprietary files in his possession;

16 WHEREAS, that process is ongoing, and as such, the parties respectfully request that this Court
17 move the deadline for the parties to file a Rule 26(f) Report and Case Management Statement to May
18 30, 2024, and reschedule the CMC hearing to June 6, 2024, or as soon as practicable.

19 NOW, THEREFORE, the parties hereby stipulate and request the Court to Order that that the
20 deadline for the parties to file a Rule 26(f) Report and Case Management Statement be May 30, 2024,
21 and that the CMC be heard on June 6, 2024, or as soon as practicable. No other deadlines will be
22 affected by this change.

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2 Dated: March 29, 2024

/s/ Ahmed ElDessouki
Counsel for Plaintiff

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5 Dated: March 29, 2024

/s/ Joel Waelty
Counsel for Defendant

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7 **Filer's Attestation:** Pursuant to Civil L.R. 5-1(h)(3), the undersigned hereby attests that the other
8 signatories have concurred in the filing of this document.

9
10 /s/ Ahmed ElDessouki
Counsel for Plaintiffs

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CADENCE DESIGN SYSTEMS, INC., a
Delaware corporation,

Plaintiff,

V.

JEFFREY APPLEBAUM,

Defendant.

Case No. 5:24-cv-00290-PCP

Judge: Honorable P. Casey Pitts

**[PROPOSED] ORDER REGARDING
JOINT STIPULATION TO EXTEND
DEADLINE TO FILE CASE
MANAGEMENT STATEMENT AND
RESCHEDULE CASE MANAGEMENT
CONFERENCE**

Upon consideration of the Joint Stipulation To Extend Deadline to File Case Management Statement And Reschedule Case Management Conference, and good cause appearing, the Court hereby ORDERS that the deadline for the parties to file a Rule 26(f) Report and Case Management Statement shall be May 30, 2024, and that the Case Management Conference shall be heard on June 6, 2024.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 1, 2024

HONORABLE P. CASEY PITTS
United States District Judge

**[PROPOSED] ORDER REGARDING CONSENT MOTION FOR ADMINISTRATIVE RELIEF TO EXTEND
DEADLINE TO FILE CASE MANAGEMENT STATEMENT AND RESCHEDULE CMC
CASE NO. 5:24-CV-00290-PCP**